

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC.,
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

*This Document Relates to Ben Shapiro et
al. v. Juul Labs, Inc., et al., Case No.
3:19-cv-07428*

Case No. 3:19-md-02913 (WHO)

Hon. William H. Orrick

STIPULATION AND ~~[PROPOSED]~~ ORDER
REMANDING ACTION TO STATE COURT

The undersigned parties stipulate and agree, subject to the Court's approval, to remand of the above-captioned action to the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, with each party to bear its own costs, actual expenses, and attorneys' fees. In support thereof, the undersigned parties state as follows:

WHEREAS, Plaintiffs commenced this action in the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, on May 17, 2019;

WHEREAS, Defendants Altria Group, Inc., and Philip Morris USA Inc. timely removed this action to the U.S. District Court for the Southern District of Florida in good faith on June 21, 2019;

WHEREAS, Plaintiffs moved to remand this action to state court on July 21, 2019;

WHEREAS, the U.S. Judicial Panel on Multidistrict Litigation transferred this action to this Court on October 2, 2019;

WHEREAS, Plaintiffs filed supplemental briefing in support of their motion to remand on March 19, 2025;

WHEREAS, Defendants have now had the opportunity to complete the deposition of Plaintiff Ben Shapiro;

WHEREAS, Defendants' opposition to Plaintiffs' motion to remand, as supplemented, is due on July 31, 2025; and

WHEREAS, the undersigned parties have met and conferred and stipulated to remand of this action to state court on the condition that each party bear its own costs, actual expenses, and attorneys' fees;

NOW THEREFORE, the undersigned parties, through their undersigned counsel, stipulate, agree, and respectfully request that the Court enter the attached proposed order remanding this action to the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, with each party to bear its own costs, actual expenses, and attorneys' fees.

Dated: July 31, 2025

Respectfully submitted,

By: /s/ Jeffrey L. Haberman

By: /s/ Timothy S. Danninger

Scott P. Schlesinger (*pro hac vice*)
Jonathan R. Gdanski (*pro hac vice*)
Jeffrey L. Haberman (*pro hac vice*)
SCHLESINGER LAW OFFICE, P.A.
1212 SE Third Avenue
Fort Lauderdale, FL 33317
Tel.: (954) 467-8800
scott@schlesingerlaw.com
jgdanski@schlesingerlaw.com
jhaberman@schlesingerlaw.com

Timothy S. Danninger (*pro hac vice*)
GUNSTER YOAKLEY & STEWART, P.A.
1 Independent Drive, Suite 2300
Jacksonville, FL 32204
Tel.: (904) 354-1980
tdanninger@gunster.com

Attorneys for Defendant Juul Labs, Inc.

Attorneys for Plaintiffs

By: /s/ Mark C. Hansen

By: /s/ David E. Kouba

Mark C. Hansen (*pro hac vice*)
Michael J. Guzman (*pro hac vice*)
David L. Schwarz (*pro hac vice*)
KELLOGG, HANSEN, TODD, FIGEL &
FREDERICK, P.L.L.C.
1615 M St., N.W., Suite 400
Washington, DC 20036
Tel.: (202) 326-7910

David E. Kouba (*pro hac vice*)
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Ave, NW
Washington, DC 20001
Tel.: (202) 942-5230
david.kouba@arnoldporter.com

*Attorneys for Defendants Altria Group, Inc.,
Philip Morris USA Inc., Altria Client Services
LLC, and Altria Distribution Company*

*Attorneys for Defendants Nicholas Pritzker,
Riaz Valani, and Hoyoung Huh*

1 By: /s/ Eugene Illovsky

2 Eugene Illovsky

3 Kevin Calia

4 ILLOVSKY GATES & CALIA LLP

5 1611 Telegraph Ave., Suite 806

6 Oakland, CA 94612

7 Tel.: (415) 500-6643

8 *Attorneys for Defendant Adam Bowen*

By: /s/ James Kramer

James Kramer

Catherine Malone

Kevin Askew

ORRICK HERRINGTON & SUTCLIFFE LLP

405 Howard Street

San Francisco, CA 94105-2669

Tel.: (415) 773-5700

jkramer@orrick.com

cmalone@orrick.com

kaskew@orrick.com

Attorneys for Defendant James Monsees


PROPOSED ORDER

**PURSUANT TO THE PARTIES' STIPULATION, AND FOR GOOD CAUSE, IT IS
HEREBY ORDERED:**

(1) *Ben Shapiro et al. v. Juul Labs, Inc. et al.*, Case No. 3:19-cv-07428, is remanded to the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida; and

(2) each party is to bear its own costs, actual expenses, and attorneys' fees in connection with removal of this action to federal court and remand of it to state court.

Date: July 31, 2025


HONORABLE WILLIAM H. ORRICK, III
United States District Judge